REMARKS

Summary

Claims 1-6, 10-36, and 38-50 were pending. In the present response, claims 10, 12, 13, 15, 16, 21, 35, 39, 41, 42, 44, 46, 49, and 50 are amended, and claims 51 and 52 are added. No new matter has been added.

Accordingly, claims 1-6, 10-36, and 38-52 are pending and under consideration.

Objections to the Specification

The Specification was objected to for not providing antecedent basis for the subject matter of claims 49 and 50, namely the terms "computer readable medium" and "storage medium." Claims 49 and 50 have been amended consistent with the language of the Specification. Support for the amendments to claims 49 and 50 may be found on page 12, as well as in Figure 7.

Rejections Under 35 USC 101

Claims 47 and 48 were rejected under 35 USC 101 as directed to non-statutory subject matter. The Office Action states that the means identified in claims 47 and 48 are interpreted as directed to software. Although portions of the Specification refer to a browser as facilitating certain portions of the method, such a browser is necessarily operated by a computing device. As illustrated in Figure 7, and the associated text beginning on page 12, an exemplary client system or server system may include various components for practicing the invention, including processors, memory, etc. Thus, there is adequate structure identified in the Specification to support the means recited in claims 47 and 48.

Rejections Under 35 USC 103

Claims 1-6, 10, 11, 18, 21, 22, 25-27, 30-32, 35, 36, 39-41, and 47-50

Claims 1-6, 10, 11, 18, 21, 22, 25-27, 30-32, 35, 36, 39-41, and 47-50 were rejected under 35 USC 103(a) over Niemi in view of Marchisio and Kohli. Applicant respectfully traverses the rejections.

When viewed as a whole, claim 1 provides features not taught or suggested by the cited art. The references fail to teach or suggest at least one feature of claim 1, and thus claim 1 is patentable over the cited art.

Niemi discloses a method of developing a list of keywords present in documents viewed by a client system over time (see Table 1 and Column 8, lines 39-48 of Niemi). Niemi builds a database of documents viewed on the client system, creates a dynamic database of keywords contained in those documents using a probabilistic measure, and then embeds search queries into all keywords present in newly-downloaded documents. When selected by a user, the queries generate a list of all previously-viewed documents that also include the selected keyword along with an overall similarity calculation. The similarity calculation is a measure of the total number of keywords the two documents have in common (see Column 6, line 41 to Column 7, line 13). In claim 1, the "second keywords [are] different from but determined to be related to first keywords," whereas Niemi simply provides a cross-reference to other documents containing the same keywords as a subject document. Niemi fails to teach other features of claim 1 as at least partially admitted in the Office Action.

Marchisio fails to remedy the deficiencies of Niemi. Marchisio discloses allowing a user to select any term in a downloaded webpage to bring about the dynamic generation of related keywords (see Marchisio column 16, lines 38-58 and Figure 9). The selected term and the related keywords are not identified in a "list established prior to the retrieving an displaying of the first information page" as recited in claim 1, rather the secondary terms in Marchisio are dynamically generated based on probability algorithms after a keyword is selected from a first downloaded webpage. Marchisio identifies secondary terms that have a certain

degree of similarity to a keyword.

As noted in the Office Action, Marchisio also describes the generation of a lexical knowledge base. However, the knowledge base is also automatically and dynamically built as responsive to the query (see Column 8, lines 20-22). In each instance, the query and the document analysis feeds back to the lexical knowledge base. The related keywords identified in Marchisio, even with reference to the lexical knowledge base, are not based on a "list established prior to the retrieving an displaying of the first information page" as recited in claim 1, but rather are based on a dynamic list that is built "automatically from the observed statistical distribution of terms and word co-occurrences in the document database" (see Marchisio, Column 11, lines 3-5).

Marchisio fails to teach other features of claim 1 as at least partially admitted in the Office Action.

Kohli fails to remedy the deficiencies of Marchisio and Niemi. Kohli provides a search engine that provides relevant search categories in response to the submission of a particular search term. As noted at Column 4, lines 59-62, "[t]he system **9** of FIG. 1 allows a user to search for three types of Yellow Pages information: categories, business names, and brands. A category specifies a specific type of goods or services." Thus, in response to a search query, the system may return categories to the user, which simply relates to the hierarchical level of the search (category, business, etc.). However, claim 1 provides a "list relating the second keywords to the first keywords" and the list is "provisioned based on established categories of keywords." Thus, the categories impact the list and/or keywords that comprise the list. Claim 1 thus provides features not taught or suggested by Kohli.

For at least the above reasons, Applicant respectfully submits that the combination of Niemi, Marchisio, and Kohli fails to teach or suggest all elements of amended claim 1 and that claim 1 is therefore patentable over the cited references.

Independent claims 18, 21, 25, 30, 35, 39, 44, 47, and 49 contain language similar to that of claim 1 and thus are patentable over the cited references for at

least the same reasons as claim 1.

Claims 1-6, 10-17, 19, 20, 22-24, 26-29, 31-34, 36, 38, 40-43, 45, 46, 48, and 50 are dependent on claims 1, 18, 21, 25, 30, 35, 39, 44, 47, and 49 and thus are patentable over the cited references for at least the same reasons discussed above.

Claims 15-17, 21-24, 35, 36, 38, 44-46, and 51

In addition to the reasons noted above, claims 15-17, 21-24, 35, 36, 38, 44-46, and new claim 51 specifically recite that the list of keywords is a "user-defined" list and/or is comprised of "user-defined" keywords. As noted above, the system in Marchisio provides a fully automated system for generating the dynamic lexical knowledge base. In particular, at Column 11, lines 2-5, Marchisio indicates that "instead of using a lexical knowledge base built manually by experts, the disclosed system builds one automatically from the observed statistical distribution of terms and word co-occurrences in the document database." As such, the system of Marchisio provides that any related terms are identified based on the complicated algorithms that are the core of that invention. Such a system is in contrast to one permitting the generation of a "user-defined list established prior to the retrieving and displaying of the first information page" such as recited in claim 15, which does not have to strictly comply with the algorithm or the statistical methodology of Marchisio.

Claims 12-17, 19, 20, 23, 24, 28, 29, 33, 34, 38, and 42

Claims 12-17, 19, 20, 23, 24, 28, 29, 33, 34, 38, and 42 were rejected under 35 USC 103(a) over Niemi in view of Marchisio and Kohli, in further view of Finseth. Claims 12-14, 19, 20, 23, 24, 28, 29, 33, 34, 38, and 42 depend from claims 1, 18, 21, 25, 30, 35, and 39, respectively. As discussed above, Applicant submits that claim 1 is patentable over the combination of Niemi, Marchisio, and Kohli. Finseth fails to remedy the above-cited deficiencies of Niemi, Marchisio, and Kohli. Thus, for at least the reasons cited above in relation to claim 1, Applicant submits that claims 12-14, 19, 20, 23, 24, 28, 29, 33, 34, 38, and 42 are patentable over the cited references.

Independent claim 15 is patentable over Niemi, Marchisio, Kohli for the reasons noted above. Further, claims 16 and 17 depend from claim 15. Finseth fails to remedy the above-cited deficiencies of Niemi, Marchisio, and Kohli. Thus, for at least the same reasons noted above, Applicant respectfully submits that claims 15-17 are patentable over the combination of Niemi, Marchisio, Kohli, and Finseth.

Claim 43

Claim 43 was rejected under 35 USC 103(a) over Niemi, Marchisio, and Kohli in further view of Hoyle.

Claim 43 depends from claim 1 and thus is patentable over the combination of Niemi, Marchisio, and Kohli for at least the reasons discussed above. Hoyle fails to remedy the above-cited deficiencies of Niemi, Marchisio, and Kohli. Thus, for at least the reasons cited above in relation to claim 1, Applicant submits that claim 43 is patentable over the cited references.

Claims 44-46

Claims 44-46 are rejected under 35 USC 103(a) over Niemi in further view of Marchisio.

Independent claim 44 is patentable over Niemi, Marchisio, Kohli for the reasons noted above. Further, claims 45 and 46 depend from claim 44. Thus, for at least the same reasons noted above, Applicant respectfully submits that claims 44-46 are patentable over the combination of Niemi and Marchisio.

Conclusion

In view of the foregoing, Applicant respectfully submits that the claims are in condition for allowance and early issuance of the Notice of Allowance is respectfully requested.

If the Examiner has any questions, the Examiner is invited to contact the undersigned at (503) 796-2844. Please charge any shortages and credit any overages to Deposit Account No. 500393.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

Dated: April 15, 2009   /Steven J. Prewitt/
                                               Steven J. Prewitt
                                               Registration No. 45,023

Pacwest Center, Suites 1600-1900
1211 SW Fifth Avenue
Portland, Oregon 97204
Telephone: 503.796.2844